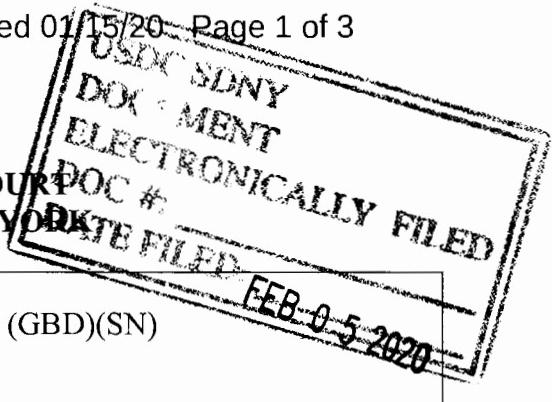


**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**



In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

Horace Morris et al. v. Islamic Republic of Iran, No. 1:18-cv-05321 (GBD) (SN)

**THE MORRIS PLAINTIFFS' NOTICE OF MOTION FOR
PARTIAL FINAL JUDGMENT III**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Jerry S. Goldman, Esq., ("Goldman Declaration"), along with the exhibits appended, certain plaintiffs in the above-referenced matter who are identified on Exhibit A and Exhibit B to the Goldman Declaration, by and through their counsel, Anderson Kill P.C., respectfully move this Court for an Order:

- (1) awarding the Plaintiffs identified in Exhibit A judgment as to damages in the same amounts previously awarded by this Court to various similarly situated plaintiffs in *Burnett, Havlish, Ashton, Bauer*, and other cases;
- (2) awarding the Estates of the 9/11 Decedents, through the Personal Representative and on behalf of all survivors and all legally entitled beneficiaries and family members of such 9/11 Decedents, as identified by the Plaintiffs set forth on Exhibit B, compensatory damages for pain and suffering in the same per estate amount previously awarded by this Court regarding other estates of decedents killed in the September 11th attacks, as set forth in Exhibit B;
- (3) awarding the Estates of the 9/11 Decedents, through their personal representatives and on behalf of all survivors and all legally entitled beneficiaries and

family members of such 9/11 Decedents, as identified on Exhibit B, an award of economic damages in the amounts as set forth on Exhibit B;

(4) awarding the Plaintiffs identified on Exhibits A and B pre-judgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment for damages;

(5) granting the Plaintiffs identified in Exhibits A and B permission to seek punitive damages, economic damages, and other appropriate damages at a later date;

(6) determining that service of process was properly effected upon the Iran Defendants in accordance with 28 U.S.C. § 1608(a) for sovereign defendants and 28 U.S.C. § 1608(b) for agencies and instrumentalities of sovereign defendants; and,

(7) granting permission for all other plaintiffs in this action not appearing on Exhibits A and/or B to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed.

Plaintiffs' request is made in connection with the judgment on default as to liability entered against the Islamic Republic of Iran on June 21, 2019. *In re Terrorist Attacks on September 11, 2001*, No. 03-md-1570, ECF No. 4595.

Respectfully submitted,

/s/ Jerry S. Goldman

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Attorneys for Plaintiffs

Dated: New York, New York
January 14, 2020

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: FEB 05 2020

Exhibit A

Ex. A to Morris
(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	PLAINTIFF First Name	PLAINTIFF Middle Name	PLAINTIFF Last Name	Relationship to 9/11 Decedent	Solatiuum Damages Amount	Economic Damages	Non-Economic Damages	TOTAL DAMAGES AMOUNT
1.	Jude	Joseph	Moussa	Jude	Joseph	Moussa	Co-PR	N/A	\$2,126,058	\$2,000,000	\$4,126,058
2.	Isidro		Ottenwalder	Eddie		Ottenwalder	Sibling	\$4,250,000	N/A	N/A	\$4,250,000
3.	Isidro		Ottenwalder	Nilda		Ottenwalder	Sibling	\$4,250,000	N/A	N/A	\$4,250,000
4.	Isidro		Ottenwalder	Olga		Ottenwalder	Sibling	\$4,250,000	N/A	N/A	\$4,250,000
5.	Timothy	A.	Roy	Ida	Mae	Roy	Parent (deceased)	\$8,500,000	N/A	N/A	\$8,500,000
6.	Timothy	A.	Roy	Linda		Amato	Sibling	\$4,250,000	N/A	N/A	\$4,250,000
7.	Timothy	A.	Roy	James		Roy	Sibling	\$4,250,000	N/A	N/A	\$4,250,000
8.	Timothy	A.	Roy	John		Roy	Sibling	\$4,250,000	N/A	N/A	\$4,250,000
9.	Timothy	A.	Roy	Gary		Roy	Sibling	\$4,250,000	N/A	N/A	\$4,250,000
10.	Timothy	A.	Roy	Kenneth		Roy	Sibling	\$4,250,000	N/A	N/A	\$4,250,000
11.	Timothy	A.	Roy	Douglas	J.	Roy	Sibling	\$4,250,000	N/A	N/A	\$4,250,000
12.	Joseph	Michael	Romagnolo	Steven	Salvatore	Romagnolo	Sibling	\$4,250,000	N/A	N/A	\$4,250,000
13.	Venesha		Richards	Shaun	L.	Rodgers	Sibling	\$4,250,000	N/A	N/A	\$4,250,000
TOTAL											\$59,376,058
TOTAL											\$55,250,000

Exhibit B

EX. B to Morris
(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	Suffix Name	Economic Damage Amount	Non-Economic Damage Amount	TOTAL Damage Amount
1.	Odessa	V.	Morris		\$1,344,649	\$2,000,000	\$3,344,649
2.	Ferdinand		Morrone		\$2,931,150	\$2,000,000	\$4,931,150
3.	Jude		Moussa		\$2,126,058	\$2,000,000	\$4,126,058
4.	Dennis	M.	Mulligan		\$2,868,783	\$2,000,000	\$4,868,783
5.	Valerie	V.	Murray		\$76,971	\$2,000,000	\$2,076,971
6.	Oscar	F.	Nesbitt			\$2,000,000	\$2,000,000
7.	Gerard	T.	Nevins		\$3,439,128	\$2,000,000	\$5,439,128
8.	Nancy	Yuen	Ngo			\$2,000,000	\$2,000,000
9.	Margaret		Orloske		\$1,768,754	\$2,000,000	\$3,768,754
10.	David		Ortiz		\$2,509,759	\$2,000,000	\$4,509,759
11.	Eileen	M.	Rice		\$1,189,758	\$2,000,000	\$3,189,758
12.	Israel		Pabon		\$1,432,971	\$2,000,000	\$3,432,971
13.	Richard	A.	Pearlman		\$1,197,393	\$2,000,000	\$3,197,393
14.	Nancy	E.	Perez		\$947,748	\$2,000,000	\$2,947,748
15.	Emelda		Perry			\$2,000,000	\$2,000,000
16.	Glenn		Perry	Sr.	\$3,185,196	\$2,000,000	\$5,185,196
17.	William	R.	Peterson		\$1,357,663	\$2,000,000	\$3,357,663
18.	Glen		Pettit			\$2,000,000	\$2,000,000
19.	Tu-Anh		Pham		\$8,152,540	\$2,000,000	\$10,152,540
20.	Giovanna		Porras		\$1,047,730	\$2,000,000	\$3,047,730
21.	Robert	D.	Pugliese			\$2,000,000	\$2,000,000
22.	Lincoln		Quappe		\$4,199,138	\$2,000,000	\$6,199,138
23.	Deborah		Ramsaur		\$1,718,491	\$2,000,000	\$3,718,491
24.	Martha	M.	Reszke		\$948,293	\$2,000,000	\$2,948,293
25.	Francis		Riccardelli		\$6,146,029	\$2,000,000	\$8,146,029
26.	Venesha		Richards			\$2,000,000	\$2,000,000
27.	Carmen	A.	Rivera		\$3,760,940	\$2,000,000	\$5,760,940
28.	Linda	I.	Rivera		\$975,352	\$2,000,000	\$2,975,352
29.	Joseph	M.	Romagnolo		\$4,882,491	\$2,000,000	\$6,882,491
30.	Mark	L.	Rosenberg		\$3,616,703	\$2,000,000	\$5,616,703
31.	Timothy	A.	Roy		\$5,883,487	\$2,000,000	\$7,883,487
32.	Isidro	D.	Ottenwalder		\$2,455,057	\$2,000,000	\$4,455,057
33.	Ronald	J.	Ruben			\$2,000,000	\$2,000,000
34.	Susan	A.	Ruggiero		\$3,828,400	\$2,000,000	\$5,828,400
35.	Hernando	R.	Salas		\$126,692	\$2,000,000	\$2,126,692
36.	Frederick	C.	Scheffold		\$2,420,060	\$2,000,000	\$4,420,060